

EXHIBIT B

The Honorable Claude M. Hilton
Senior United States District Judge

April 18, 2016

Dear Judge Hilton,

Thank you for this opportunity to address the court. Kindly let me tell you a little about me, my family and the matters surrounding my failure to report income on my tax returns.

My Family

What is most important to me in life is my family, so I would like to discuss them first.

In 1985, I met my wife Celia while running a corporate travel agency. Celia and I had a lot in common as her father was in the British Foreign Service and she had grown up all over the world. Celia and I were married in June of 1986 and so we will celebrate our 30th anniversary this year, with God's grace. I could not be any more fortunate in finding Celia. She is a beautiful person with a beautiful soul. She is the most nurturing and empathic person that I have ever met. She has an infectious enthusiasm for life and is always positive about change and new experiences. Simply put, she loves to help people. We were blessed to have 3 beautiful daughters born healthy in Fair Oaks hospital, Virginia. I am very proud of them and love them equally. It also very important to me that they love each other and are close and supportive. The terrible dysfunction in my own family borne out of intense favoritism and intentional negative competitive structures has made me intensely aware of the kinds of things to avoid in family relations.

It was very important for my wife and myself to encourage our children to pursue and complete a good education in a field that was of interest to them and that we would be supportive parents in these endeavors.

We are so pleased that Altaire graduated from University of Virginia and went on to earn a Masters Degree from University of Sussex. Altaire has a great love for our planet and its indigenous tribal peoples and puts that love into active good use. She works with various small communities and villages mostly in the Indonesian archipelago to help them with adjusting their business and agricultural income generating activities to be more sustainable and profitable in today's global markets while at the same time empowering women to have more financial and personal power in their own lives. Altaire maintains her USA citizenship as well as UK citizenship.

Our middle daughter, Victoria (Astara), has graduated from Bath Spa University in Bath England in the year 2014. She earned her degree in Dramatic Arts and Creative Writing. So, while she clearly has a very artistic side she also has a good way with words and can write well or speak to a large audience with confidence and mature presence. We are proud that within a couple of months of Victoria's relocation to London, she had secured a very good job with the top notch recruiting agency. But Victoria has not given up on her dream of being part of the dramatic arts so she spends much of her free time donating her efforts to script writing and acting for the Shunt theater group in London.

Our youngest daughter, Alaya, who turned 21 last September, is in her final year at University of the Arts London, College of Fashion and will be graduating this June with a degree, BA (HONS) Hair, Make-Up and Prosthetics for Performance. She is one of these individuals who chose a narrow focus vocation that she is passionate about and followed it with persistent good effort.. An artistically capable person in this

field is in tremendous demand by the movie industry and Alaya has already had serious feelers put out by a couple of studios that could potentially hire her. We are proud of her for following her dream so assiduously.

[I must add here that telling my wife and daughters about my transgressions was one of the hardest things I have done in my entire life.]

My Background

I was born in Bombay India in 1955 to a Parsi Zoroastrian father, Kershi Shiavax Cambata from Bombay and an American mother, Phebe Delman Cambata, who is of Russian and Polish Jewish extraction and whose grandparents immigrated to the United States in the 19th century.

At age three my family moved to Connecticut. So my earliest schooling was in the USA and was a very positive experience. After approximately 10 years of living in Connecticut, my family moved back to Bombay, India and my father took over direct control of the Cambata family businesses in India. In 1967, my siblings and I were enrolled in school in Bombay, the Cathedral & John Connon High School. I attended this school from 1967 till 1970. In 1970 my family moved to Singapore and my siblings and I were enrolled in the Singapore American School.

In 1972 we moved to London and we (the children) were all enrolled in the American School London, where I graduated high school in 1973.

As the eldest son, I was groomed to inherit control of the family businesses as my father had inherited it from his father. Many things were done for me and expected from me in this role that I was placed in. The first big and perhaps most important breakthrough for the India Aviation company came in 1980 when we were able to purchase our own set of wide-body aircraft ground handling equipment and commence full ground handling operations of British Airways in Bombay. I coordinated and implemented this entire operation in the face of massive strikes.

This is the point I think the first signs of strain began to develop between my father and myself. I wanted to modernize the company from top to bottom and copy the management plan of some of the other successful Zoroastrian owned companies in India. I felt that by modernizing and dealing with issues like human resources in a modern, fair and open manner you starve out the heavily corrupt institutions that plague companies in India. At the same time my father was becoming increasingly prone to surrounding himself with yes men. These corrupt managers also began to work closely with my brother Nelson. But despite these tensions between my father and me, my father adopted many of my suggestions regarding the expansion of the company.

In the early/mid 1990's the aviation company in India was again on the verge of another major expansion phase and my father wanted me closer to his home and office in Virginia. So we re-located to Staunton Virginia, so I could spend time with him in the office and of course also travel back and forth to India. During this period, while I would travel all over the world to meet with airline customers to renegotiate ground handling contracts, etc., I always had this fondness for our customers at Swissair and Switzerland in general.

By the time the early 2000's arrived I could tangibly tell that my father was edging me away from the central portion of the business. I had completed the major expansion program in India and now he was exclusively listening to the "yes men". I didn't fight him. I had a burning desire to start an aviation operation in the USA and, I started an air ambulance service in which my father and I invested over 5 million dollars. This was really more of a public service enterprise to our community in the Shenandoah

Valley to help transport seriously ill patients all over the country, and this company was not projected to turn a profit for a number of years.

But notwithstanding these accomplishments, my relationship with my father deteriorated

My Father's Gift

In 2006 my father's health was deteriorating. (My father died in 2008 from congestive heart failure) In October of 2006 my father called a family meeting at his home in Virginia. Included in the meeting were my mother, my sister and my two brothers. The meeting was conducted in my father's home office. Also in attendance were two officers of UBS Bank, one was from the Bahamas and the other from Zurich. My father advised the family that he would be giving each a gift of approximately \$12 million. He also stated that the family would be instructed by the bank officers how to open accounts and that the accounts should be opened in Zurich. Upon the advice of the Swiss advisors, I opened the account at UBS in Switzerland under the name Dragonflyer. At the time of the gift, Cambata Aviation, S.A. (Panama) and Hummingbird, what I believe to be the source of the funds representing the gift, were both controlled completely by my father

My Family's Move to Switzerland

By late 2006 it was apparent to me that my father had selected my brother Nelson to be in charge of the various family companies. This caused a considerable amount of family strife. At this time we were living in Stanton Virginia, not far from my parents and siblings. I discussed the situation with my wife and we both agreed that we were grateful for my father's generous gift. However, with the prospect that Nelson would soon be in charge of all the companies, we decided that it was best for us and our children that we move and get as far away from the dysfunctional family and businesses as possible. With the jealousy from my other siblings and a strange indifference from my mother, we could no longer stay in close proximity to my family. I had spent considerable time in Switzerland as a child. Celia had vacationed in Switzerland as a child. Switzerland was a natural choice. We moved to Switzerland in August 2007.

My Expatriation

By the time 2011 had arrived, I was in a continuing battle with my siblings over the various companies started and governed by my then deceased father. My family had been living in Switzerland for almost four years and we had no connection to the United States. Be clear that I love the United States but I had no plans on returning and circumstances required I renounce my US citizenship. By 2011 the Swiss banking system had no interest in accounts of US citizens. It was becoming increasingly difficult for me to even be considered as a customer of a bank as a US citizen. This was also happening all over Europe. I also hoped that I might be able to fight my way back into the senior management within Cambata Aviation in India. With the amount of damage that had been done to the company I would have had to initiate a massive travel regime to visit customers all over the world. Many of those customers are in the Middle East and of Arab or Muslim persuasion. I had a concern about traveling to these places on a US passport as I believed that US citizens can be a target in these locations. I had been born outside the US, I had no assets in the US, I was estranged from my family that all live in the US and my immediate family had made a new life in Switzerland. It made little sense for me to maintain a US passport.

In September 2012, I went to the U.S. Embassy in Slovakia to renounce my United States citizenship because that embassy had the shortest waiting list for expatriation interviews. The waiting list in Switzerland was more than a year.

At the time I was taking the necessary steps to secure Swiss citizenship. This is a long process and I could not be literally a "man without a country" after renouncing my US citizenship and before securing Swiss citizenship. Accordingly, like many people in my situation I needed to acquire citizenship which I did in St. Kitts and Nevis which has a program where a person can become naturalized as a citizen of St. Kitts & Nevis by contributing a sum of money to the Sugar Industry Diversification Foundation.

Bank Accounts and Dividends

Over time I was not happy with the way that UBS was managing the funds in my account (the account at UBS set up at the recommendation of the Swiss banker I met at the meeting with my father and his family) and I decided to move the funds to another bank. The question arose as to where to send the funds. I had been advised by my tax attorneys in Switzerland that I was on the Swiss "Global Taxation" system, and there would be Swiss tax savings by keeping the bulk of my funds outside of Switzerland. I (and the global banking industry) at the time was almost paranoid about the looming possible failure of banks. As a precaution, I split up the funds into two amounts and sent them to Julius Baer Singapore and Credit Suisse Monaco. My Swiss advisors made the point that it would be better to stay with large Swiss banks as they were perceived to be the most secure. Julius Baer and Credit Suisse are the two next largest banks in Switzerland after UBS. I chose the locations of Singapore and Monaco because I had lived in both locations and therefore felt comfortable with banking in those countries.

Over the years I have received dividends from a company called Hummingbird. I recall receiving dividends from Hummingbird in 2009 in the total amount of \$300,000, all of which was reported on my timely filed 2009 US income tax return. I also recall receiving dividends from Hummingbird in 2010 in the total amount of \$600,000, all of which was reported on my timely filed US income tax return. In 2011 I was involved in hotly contested litigation in India with my brother who at that time controlled the family businesses. The total 2011 dividends were projected to be reduced to \$200,000. As a statement of protest to the way in which the family affairs were being conducted I refused the receipt of the dividends starting in the 4th quarter of 2011. Hummingbird stopped paying dividends in the 3rd quarter of 2012. In 2013, the litigation had proven to be unsuccessful, I understood that dividends were no longer then being paid and I sought payment of the unpaid 2011/2012 dividends.

I had retained a Virginia based accounting firm to prepare my US tax returns. The tax return preparer was aware that I lived in Switzerland. The address on the tax return is in Switzerland, the tax returns reported that I was subject to social security taxes in Switzerland, and I communicated with the accountant from my home in Switzerland. The tax return preparer was aware that I had a bank account in Switzerland but the question on the tax return about having a foreign account was erroneously check "No" by the tax return preparer. Ultimately, I am responsible for my own tax return however I did not notice the referenced question on the return and the error in checking the box "No".

I want to point out another mistake on my part. I did not file US tax returns for 2011 or 2012. I had started discussing with my Swiss advisors the expatriation process in 2011 and I had surrendered my US passport in September 2012. In 2012 my mind set was that I had cut my ties completely with the US and I gave no thought to the need to file a tax return; all my income was from sources outside the US. I regretfully did not seek professional advice in this regard and I now understand that I was obligated to file US tax returns for 2011 and a portion of 2012. I am in the process of correcting these errors.

My Failure to Report Interest Income

Your Honor, I am guilty of not reporting the interest income earned on my accounts in 2007 and 2008. Obviously, and I knew it, accounts with a few millions of dollars in them had to generate at least some income in those days and I knew that and I failed to look and properly report that income. I

intentionally ignored the accounts and didn't bother to check how much they had earned. This was wrong. I have disgraced my family and irreparably injured my good standing in the community. I deeply regret that and sincerely apologize to the court and IRS for that. It was wrong and there are no excuses for it. I try to do what is proper in every aspect of my life. And in this regard I understand how I undermined my own principles and I am remorseful for this personal failure and can give you my full assurance that my serious lapses in judgement will not occur again.

Yours Sincerely,



Albert Cambata